

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 )  
                                )  
vs.                         ) No. 4:22-CR-00233-SRC-JMB  
                                )  
CHRISTOPHER DILLARD,     )  
                                )  
Defendant.                 )

**MOTION FOR PRE-TRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Nathan Chapman, Assistant United States Attorneys for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. The defendant is charged in Counts I, II, and V with offenses for which the maximum term of ten years or more is prescribed in the Controlled Substances Act (21 U.S.C. 801 et seq.), distribution of a controlled substance in violation of Title 21, United States Code, Section 841(a)(1). *See* 18 U.S.C. § 3142(e)(3)(A) and (f)(1)(C). In Count III, the defendant is charged with an offense under Title 18, United States Code, Section 924(c). *See* 18 U.S.C. § 3142(e)(3)(B).

2. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will

reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

3. Pursuant to Title 18, United States Code, Section 3142(g), the nature of the allegations against the defendant, the weight of the evidence against the defendant, the defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by the defendant's release additionally warrant the defendant's detention pending trial.

4. The events relating to the current indictment happened in 2019. The investigation culminated in a search warrant of the defendant's residence at 4110 Louisiana, St. Louis, Missouri 63118. On December 3, 2019, the defendant was present as investigators executed the search warrant at his residence and recovered several firearms. Defendant has a prior conviction for felon in possession of a firearm and is prohibited from possessing firearms (4:04-CR-00292-1-SNL).

5. Defendant was indicted in April of 2022, and a suppressed warrant for his arrest has been outstanding since that time. In August of 2022, the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) opened their own separate investigation into the defendant. Investigators discovered that the defendant was still selling controlled substances out of his house at 4110 Louisiana. Surveillance of defendant's residence was conducted between October 2022 through November 2022. During that time, the defendant was seen in conducting multiple hand to hand drug transactions while in the possession of various firearms.

6. On November 17, 2022, a search warrant was executed at the defendant's residence at 4110 Louisiana. A preliminary search of the residence has resulted in the discovery of multiple firearms.

7. Defendant has a criminal history that began in 1995, when he received a suspended imposition of sentence for robbery in the first degree. In 1997, the defendant was sentenced to two years imprisonment for obstruction of justice/destruction of evidence. In 2004, the defendant was convicted federally of felon in possession of a firearm and sentenced to eight months in the Bureau of Prisons. The defendant's supervised release was later revoked in 2005.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

*/s/ Nathan Chapman*  
NATHAN CHAPMAN, #60978MO  
Assistant United States Attorney

#### CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

*s/ Nathan Chapman*  
NATHAN CHAPMAN, #60978MO  
Assistant United States Attorney